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AND

CLARK COUNTY SCHOOL DISTRICT
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*Attorneys for DEFENDANTS
Clark County School District and Board of
Trustees of the Clark County School District*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SARA QUINTANA,

Plaintiff,

vs.

CLARK COUNTY SCHOOL DISTRICT, a
political subdivision of the State of Nevada;
and the BOARD OF TRUSTEES OF THE
CLARK COUNTY SCHOOL DISTRICT,
in their official capacities,

Defendants.

CASE NO. 2:21-cv-00023-CDS-MDC

**STIPULATION AND ORDER
TO EXTEND JOINT PRETRIAL
ORDER DEADLINE TO 60 DAYS
AFTER SETTLEMENT
CONFERENCE**

(THIRD REQUEST)

IT IS HEREBY STIPULATED AND AGREED by Defendants CLARK COUNTY
SCHOOL DISTRICT (CCSD) and the BOARD OF TRUSTEES OF THE CLARK COUNTY

1 SCHOOL DISTRICT (BOT) through their attorneys STEPHANIE A. BARKER, ESQ. of the law
2 firm of OLSON CANNON & GORMLEY, and CRYSTAL J. PUGH, ESQ. of the OFFICE OF
3 THE GENERAL COUNSEL FOR THE CLARK COUNTY SCHOOL DISTRICT; and by
4 Plaintiff SARA QUINTANA through her attorneys JAMES P. KEMP, ESQ. of the law firm
5 KEMP & KEMP, and JAMES A. HILL, ESQ. of the law firm GILBERT EMPLOYMENT LAW,
6 P.C., that:

7 IN CONSIDERATION OF THE FOLLOWING:

- 8 1. On February 21, 2024, pursuant to the Court's Order (ECF 62) Granting in Part and
9 Denying in Part Defendants' Motion for Summary Judgment, pursuant to LR 16-5 this
10 case was referred to the Magistrate Judge for a settlement conference. The Order also
11 directed that if the case did not settle, the parties must file their joint pretrial order 30
12 days after the conclusion of the settlement conference. ECF 62, p. 23.
- 13 2. A settlement conference was originally scheduled for June 18, 2024 (ECF 63) but did
14 not proceed following Magistrate Judge Koppe's recusal on June 13, 2024 (ECF 64).
15 Following reassignment to Magistrate Judge Albregts and resetting of the settlement
16 conference to July 19, 2024 (ECF 65), a single extension of time was granted to
17 accommodate Plaintiff's counsels' schedules and the settlement conference was re-
18 rescheduled for and held on November 4, 2024. (ECF 83.)
- 19 3. The settlement conference was not successful. (Minute Order November 4, 2024).
- 20 4. In light of the Court's Order (ECF 62) on Defendants' Motion for Summary Judgment,
21 the parties have significantly differing views regarding how trial should proceed and
22 the length of time necessary to complete the trial, which differences will require
23 significant discussion between the parties in compliance with LR 16-3(b) in order to
24 come to agreement on a Joint Pretrial Order.
- 25 5. Defense counsel Stephanie A. Barker, Esq., was out of the office and out of the country
26 on a pre-scheduled vacation between November 22 and December 11, 2024.
- 27 6. In light of defense counsel's schedule, and scheduling conflicts created by the
28 upcoming holiday season, the parties entered into a First Stipulation To Extend Joint

1 Pretrial Order Deadline to January 3, 2025 – 60 days after the Settlement Conference.
2 (ECF 72, filed on November 20, 2024.)

- 3 7. On November 21, 2022, the court entered an Order Granting the [First] Stipulation to
4 Extend Joint Pretrial Order Deadline to January 3, 2025. (ECF 73.)
- 5 8. On December 18, 2024, approximately one week after defense counsel returned to her
6 office, defense counsel sent correspondence to Plaintiff's counsel confirming efforts
7 to schedule a meet and confer conference regarding the Joint Pretrial Order, and
8 outlining nine initially identified potential Motion in Limine topics for discussion.
- 9 9. Subsequently, a first telephonic conference was scheduled between counsel for Friday,
10 December 20, 2024. At that time one of Plaintiff's trial attorneys was unable to attend
11 the conference due to a personal emergency. The conference was re-scheduled for
12 Monday, December 22, 2024.
- 13 10. On Monday, December 22, 2024, the parties held their first telephonic meet and confer
14 conference regarding the Joint Pretrial Order. Therein the parties discussed their
15 differing views of the remaining legal and factual issues for trial, and the potential
16 scope of the evidence as related to each party's view. Counsel agreed that a draft Joint
17 Pretrial Order would assist the parties' efforts to define the remaining legal and factual
18 issues. Accordingly, counsel for Plaintiffs agreed to provide a proposed draft of the
19 Joint Pretrial Order to defense counsel on or before Friday, December 27, 2024.
- 20 11. A subsequent telephonic meet and confer was scheduled for January 2, 2025.
- 21 12. On December 26, 2024, the parties submitted a second Stipulation To Extend Joint
22 Pretrial Order Deadline (Second Request) to January 17, 2025, seeking an additional
23 two weeks to settle remaining disputes regarding the scope of the evidence to be
24 presented at trial. (ECF 74, filed on December 26, 2024.)
- 25 13. On January 2, 2025, the court entered an Order Granting the [Second] Stipulation to
26 Extend Joint Pretrial Order Deadline to January 17, 2025. (ECF 75.)
- 27 14. Since that date the parties have exchanged multiple drafts of the proposed Joint Pretrial
28 Memorandum (December 27, 2024, and January 9, 16, and 17, 2025) and have

1 engaged in telephonic meet and confer conferences regarding the content of those
2 drafts on January 10, January 13, 2025. The fourth revision of the proposed Joint
3 Pretrial Order is currently being reviewed by Plaintiff's counsel.

4 15. Plaintiff's counsel has experienced scheduling conflicts in the past few days, and is
5 currently under the weather, thus impeding completion of the Joint Pretrial
6 Memorandum by today's January 17, 2025, deadline.

7 16. The parties, therefore, request the current January 17, 2025, due date for submission
8 of the Joint Pretrial Order be extended an additional three (3) court days to Thursday,
9 January 23, 2025, to allow adequate time for the parties to complete their review and
10 discussion regarding the fourth draft of the proposed Joint Pretrial Order currently
11 under review.

12 17. This is the parties' third Stipulation to Extend the Joint Pretrial Order deadline. It is
13 not submitted for the purpose of delay, but rather is submitted in a good faith effort to
14 narrow and define the scope of the issues to be presented at trial.

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NOW THEREFORE, THE PARTIES HEREBY STIPULATE that the deadline to file the Joint Pretrial Order be extended for three additional court days to January 23, 2025.

RESPECTFULLY SUBMITTED.

DATED this 17th day of Jan., 2025.

KEMP & KEMP

/s/ *James P. Kemp*

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Attorneys for Plaintiff
Sara Quintana

DATED this 17th day of Jan., 2025.

OLSON CANNON & GORMLEY

/s/ *Stephanie A. Barker*

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Attorneys for Defendants
Clark County School District and Board of
Trustees of the Clark County School District

IT IS SO ORDERED.

DATED: 1-21-25

UNITED STATES MAGISTRATE JUDGE

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